

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND
COMPOUNDING PHARMACY CASES
LITIGATION

MDL No. 2419

Master Dkt.: 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

All Actions

**ASSENTED-TO MOTION FOR ENTRY OF AGREED ORDER EXTENDING DEADLINES FOR
RESPONSES TO CERTAIN MOTIONS TO DISMISS BY TENNESSEE CLINIC DEFENDANTS**

As evidenced by the signatures below, the parties agree and jointly move the Court for entry of the Agreed Order attached hereto as Exhibit 1. The Agreed Order extends the deadline to May 9, 2014, for Plaintiffs to file responses to the Tennessee Clinic Defendants' Motion to Dismiss the Plaintiffs' Complaints for Failure to Comply with Tenn. Code Ann. § 29-26-121 (Dkt. No. 770) and the Saint Thomas Entities' and Ascension Parties' Motion to Dismiss for Failure to Comply with Tennessee Health Care Liability Act (Dkt. No. 779). The Agreed Order also sets the deadline of June 9, 2014, for filing any replies. The Agreed Order also sets forth the issues that the parties agree are "global" for briefing purposes and therefore will be briefed for the Court's decision at this time, with all other case-specific issues to be decided at a later time in accordance with further orders of the Court.

According, the undersigned parties request that the Court enter the Agreed Order attached hereto as Exhibit 1.

Dated: April 24, 2014

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing ASSENTED-TO MOTION FOR ENTRY OF AGREED ORDER and the accompanying Exhibit 1 ([PROPOSED] AGREED ORDER EXTENDING DEADLINES FOR RESPONSES TO CERTAIN MOTIONS TO DISMISS BY TENNESSEE CLINIC DEFENDANTS) were served via the Court's electronic filing system on April 24, 2014.

/s/ Mark P. Chalos

Mark P. Chalos